

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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US BANKRUPTCY COURT
DISTRICT OF DELAWARE

In Re

W. R. Grace & Co., et al.

Case No. 01-01139

Debtor.

Chapter 11

**VERIFIED STATEMENT OF MULTIPLE PARTY REPRESENTATION
UNDER FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

The Office of the Tennessee Attorney General (the "Office"), pursuant to Federal Rule of Bankruptcy Procedure 2019, does hereby verify that it has been retained to represent more than one party in the above-referenced Chapter 11 bankruptcy case. Pursuant to Federal Rule of Bankruptcy Procedure 2019, the Office hereby provides the following information with respect to each of the parties for which it has been retained:

1. The Office has represented and continues to represent the following state departments:
 - (i) Tennessee Department of Revenue ("TDOR"), located at Andrew Jackson Building, 500 Deaderick Street, Nashville, TN 37242;
 - (ii) Tennessee Department of Environment & Conservation ("TDEC"), located at 401 Church Street, Nashville, TN 37219;
 - (iii) Tennessee Department of Finance and Administration ("Finance and Administration"), located at 312 8th Avenue North, 22nd Floor, Nashville, TN 37243;
2. TDOR holds a pre-petition priority tax claim against W.R. Grace & Co. in the amount of \$2,066.55. This claim is based on original and delinquent tax returns for the period

beginning January 2001.

3. TDEC holds claims against W.R. Grace & Co. On May 3, 2001, four unsecured pre-petition claims were filed on behalf of the Superfund Division. They are as follows: \$335.65 for site 58-501, \$170.07 for site 33-534, \$1,729.58 for site 79-536, and \$12,667.05 for sites 79-536 and 55-508. The Debtors objected to claim no. 18, in the amount of \$1,729.58, in their Third Omnibus Objection. As this claim is included in the claim for \$12,667.05, an objection was not filed. Therefore, the claim in the amount of \$1,729.58 was expunged.

5. The Tennessee Department of Finance and Administration, Capital Projects Division, holds an unsecured claim against W. R. Grace & Co. for asbestos related property damage. This claim was filed on or around March 28, 2003.

4. The Office has always represented the TDOR, TDEC, and Finance and Administration. Pursuant to Tennessee Code, the "attorney general and reporter...shall represent all offices, departments, agencies...of the state now in existence or which may hereafter be created." Tenn. Code § 8-6-301.

5. The Office itself does not own any claims against the Debtors.

6. In the event that any of the above material changes, the Office will promptly file a supplemental statement setting forth any changes.

Dated: October 22, 2004.

Respectfully Submitted,

PAUL G. SUMMERS
Attorney General and Reporter

/s/ Marvin E. Clements, Jr.
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